



COHEN & GRESSER LLP

800 Third Avenue  
New York, NY 10022  
+1 212 957 7600 phone  
www.cohengresser.com

Jonathan S. Abernethy  
(212) 957-7600  
jabernethy@cohengresser.com

## MEMO ENDORSED , pg. 2.

August 26, 2024

### VIA ECF

The Honorable Edgardo Ramos  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

***Re: United States v. William Morro, S18 17 Cr. 630 (ER)***

Dear Judge Ramos:

On behalf of our client, William Morro, we respectfully submit this letter to request that sentencing, currently scheduled for September 11, 2024, be adjourned. The reason for this request is that the U.S. Probation Office did not disclose the draft Presentence Report (PSR) to us until the afternoon of Thursday, August 22. Additionally, we did not learn of the sentencing date of September 11 until that same time.

In preparation for sentencing, we need adequate time to review and make objections to the PSR with our client. The late disclosure of the PSR does not allow us time to do so with the current sentencing date of September 11.



The Honorable Edgardo Ramos  
United States District Court  
Southern District of New York  
August 26, 2024  
Page 2

In light of these circumstances, we respectfully request that the Court adjourn sentencing until either Oct. 10, 16, or 18. This is the first such request. The government consents to the request.

Respectfully submitted,

/s/ Jonathan S. Abernethy  
Jonathan S. Abernethy  
**COHEN & GRESSER LLP**  
800 Third Avenue, 21<sup>st</sup> Floor  
New York, New York 10022  
(212) 957-7600  
jabernethy@cohengresser.com

cc: [Kevin.mead@usdoj.gov](mailto:Kevin.mead@usdoj.gov) (via ECF)  
[mcohen@cohengresser.com](mailto:mcohen@cohengresser.com) (via ECF)  
[alifshitz@cohengresser.com](mailto:alifshitz@cohengresser.com)  
[wjohnson@kslaw.com](mailto:wjohnson@kslaw.com)  
[zfardon@kslaw.com](mailto:zfardon@kslaw.com)

Sentencing is adjourned to October 18, 2024, at 11:30 a.m.  
SO ORDERED.

A handwritten signature in blue ink, appearing to read 'Edgardo Ramos', written over a horizontal line.

Edgardo Ramos, U.S.D.J.

Dated: 8/27/2024

New York, New York